

Privacy Policy

INTRODUCTION

Welcome to Surgan Professional Limited's Privacy Notice. Here at Surgan, we take your privacy very seriously. This Privacy Notice contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and control you can exercise in relation to it. Please read this notice carefully to understand our practices regarding your personal data and how we will treat it.

The areas covered in this privacy notice:

- Who we are
- What information do we collect about you
- How we use your personal data
- The basis upon which we use your personal data
- Cookies
- Who we share your personal data with
- How do we protect your personal data
- Keeping your personal data secure
- Which countries we transfer your personal data to
- Making a complaint
- Updates
- Contact us

1. Who we are

Surgan Professional Limited ("Surgan Professional", "Surgan", "we", "us", "our" and "ours") is a Limited Liability company registered in Ireland - Company Registration No. 524689. Our registered office is at Knockmonlea, Youghal, Co. Cork, Ireland.

We have appointed a Data Protection Officer who is responsible for assisting with enquiries in relation to this privacy notice and our treatment of your personal data. If you wish to contact our Data Protection Officer, please use the contact details in paragraph 12 (Contact us).

2. What information do we collect about you?

We may collect personal data from you in the course of our business, through your use of our website, when you contact or request information

from us, when you engage any of our services or as a result of your relationship with one or more of our staff and clients.

The personal data that we process includes:

- **Contact information:** your name, position, role, company or organisation, telephone (including mobile phone number where provided) as well as email and postal address.
- **Information from public sources:** e.g. Companies House, LinkedIn and similar professional networks, directories or internet publication
- **Information in connection with studies or surveys:** where this is necessary to conduct the investigation or proceedings
- **Attendance records:** information you provide to us for the purposes of attending meetings, training sessions and other events, including access and dietary requirements
- **Subscriptions/preferences:** when you subscribe to receive notifications about promotions or newsletters as well as consent preferences to help us identify which materials you are interested in receiving
- **Supplier data:** contact details and other information about you or your company or organisation where you provide services to Surgan.
- **Financial information:** such as payment-related information
- **Technical information:** such as information from your visits to our website or applications or in relation to materials and communications we send to you electronically
- **Identification and background information:** photographic identification provided by you or collected as part of our business acceptance processes and compliance with applicable laws and regulatory requirements

3. How we use your personal data

We use your personal data in order to:

- **Provision of services:** provide technical advice and services to you and our clients, and look at ways to improve our service to you and our clients.
- **Business relationship:** manage and administer our relationship with you, your company or organisation including keeping records about business contacts, services and payments so we can customise our offering for

you, develop our relationship and target our marketing and promotional campaigns

- **Website monitoring:** to provide and improve our website, including auditing and monitoring its use
- **Premises security:** to provide security to our offices and other premises (normally collecting your name and contact details on entry to our buildings)
- **Events:** running project briefings, workshops and other business events;
- **Surveys, studies and feedback:** including events feedback and client listening exercises as well as answering issues and concerns which may arise

4. The basis upon which we use your personal data

Data-protection legislation requires Sorgan Professional to have a legal basis for processing your personal data. We will process your personal data for a number of reasons:

- **Our engagement with you:** we will process your personal data so we can carry out our contract with you, or to take any steps you ask us to before entering into a contract with you.
- **You have given us consent:** for example where you share details for particular purposes
- **Compliance with legal or regulatory obligations:** we will process your personal data for the purposes of satisfying our legal and regulatory obligations (for example anti-money laundering and mandatory client screening checks or disclosure to law enforcement)
- **Our legitimate business interests or those of a third party:** we may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of your personal data (see below for our legitimate business interests)

Legitimate business interests

Sorgan Professional have legitimate business interests in:

- The provision of technical services
- Managing our business and relationship with you or your company or organisation
- Understanding and responding to inquiries and client feedback

- Understanding how our clients use our services and websites
- Identifying what you and our clients want and developing our relationship with you, your company or organisation
- Improving our services and offerings
- Enforcing our terms of engagement and website and other terms and conditions
- Ensuring our systems and premises are secure
- Developing relationships with business partners
- Ensuring debts are paid.

Personal data about others

In some cases, you may provide personal data to us about other people (such as your customers, directors, officers, shareholders or beneficial owners). You must ensure that you have given those individuals an appropriate notice that you are providing their information to us and have obtained their consent to that disclosure.

Marketing communications

We may use your personal data to send you follow up information (by email) that might be of interest to you.

If you are our client we have a legitimate interest in processing your personal data for promotional purposes. This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

You have the right to opt out of receiving promotional communications at any time by:

Contacting us (our contact details are set out below)

- Using the 'unsubscribe' link in emails
- Updating your marketing preferences using the link at the foot of our emails.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

5. Cookies

We use cookies on our website. They collect and store information when you visit our website about how you use it through which it is possible to record your use of the website, as well as provide you with a better service and experience when browsing and for analytics. The personal data we

collect through these technologies will also be used to manage your session.

For more information about cookies and how we use them, please see our Cookies Policy.

6. Who we share your personal data with

From time to time we may have to pass on your personal data to other people or organisations to provide our services to you. These include:

- Expert witnesses and arbitrators/mediators
- In legal proceedings – the court and others required by law or by the rules or order of the court
- Medical practitioners and specialists
- Suppliers who support our business including IT and communication suppliers, outsourced business support, marketing and advertising agencies
- Screening service providers who assist us in complying with legal obligations in relation to the prevention or protection of crime, anti-money laundering, sanctions screening and other required checks
- We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers relating to ensure they can only use your personal data to provide services to us and to you.
- We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.
- We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

7. How do we protect your personal data

We generally keep your information as needed to provide our services. This will depend on a number of factors such as whether you or your company or organisation are an existing client or have interacted with recent client mailings or bulletins or attended recent events. We will retain your information as necessary to comply with legal or regulatory requirements. Typical retention periods will range from 7 years.

8. Keeping your personal data secure

We have implemented generally accepted standards of technology and operational security in order to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Although we use appropriate security measures once we have received your personal data, the transmission of data over the internet (including by email) is never completely secure. We endeavour to protect personal data, but we cannot guarantee the security of data transmitted to or by us.

9. Which countries we transfer your personal data to

We do not transfer the information you give us to countries outside the European Economic Area (EEA), except where the international transfer is necessary in connection with the legal services we are providing to you.

If we transfer your information outside of the EEA in this way, and the country in question has not been deemed by the EU Commission to have adequate data protection laws, we will provide appropriate safeguards and we will be responsible for ensuring your privacy rights continue to be protected as outlined in this notice. Please contact us if you want further information on the specific mechanism to be used by us if we are to transfer your personal data outside of the EEA.

10. Your rights

It is important that the personal data we hold about you is accurate and current. Should your personal data change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

Under certain circumstances, the data protection legislation gives you the right to:

- **Access:** you are entitled to ask us if we are processing your data and, if we are, you can request access to your personal data. This enables you to receive a copy of the personal data we hold about you and certain other information about it
- **Correction:** you are entitled to request that any incomplete or inaccurate personal data we hold about you is corrected

- **Erasure:** you are entitled to ask us to delete or remove personal data in certain circumstances. There are also certain exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or for regulatory purposes
- **Restriction:** you are entitled to ask us to suspend the processing of certain personal data about you, for example if you want us to establish its accuracy or the reason for processing it
- **Transfer:** you may ask us to help you request the transfer certain of your personal data to another party
- **Objection:** where we are processing your personal data based on a legitimate interest (or those of a third party) and you may challenge this. However, we may be entitled to continue processing your information. You also have the right to object where we are processing your personal data for direct marketing purposes
- **Consent:** where we are relying on consent to process your personal data you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the above rights, please contact us using the contact details below.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We hope that we can resolve any query or concerns you may have and want to raise with us using the contact details provided below. If you are not satisfied with how we handle any query or concern that you raise with us, you lodge a complaint with the Office of the Data Protection Commissioner.

11. Making a complaint

Postal Address: Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23, Ireland.

Telephone: +353 (0761) 104 800
email info@dataprotection.ie
Website: <https://dataprotection.ie>

12. Updates

This version of our Privacy Notice was last updated in May 2018 and historic versions can be obtained by contacting us. We may update this Privacy Notice at any time by publishing an updated version on our website. So that you know when we make changes to this privacy statement, we will amend the revision date at the top of this document. The new modified or amended Privacy Notice will apply from that revision date. Therefore, we encourage you to review this Privacy Notice periodically to be informed about how we are protecting your information.

13. Contact us

If you have any questions regarding this Privacy Notice or if you would like to speak to us about the manner in which we process your personal data, you may contact our Data Protection Officer using the following methods:

E-mail: edina.lebhardt@surganpro.com

Post:

Surgan Professional Limited
Knockmonlea, Youghal
Co. Cork
Ireland